

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

---

CONNOR O'KEEFE, on behalf of himself and all others similarly situated,	)	
	)	Case Number 1:23-cv-20700-JEM
Plaintiff,	)	
	)	
v.	)	<b><u>CLASS ACTION</u></b>
	)	
SEQUOIA CAPITAL OPERATIONS, LLC, et al.,	)	
	)	
Defendants.	)	
	)	

---

**PLAINTIFF O'KEEFE'S NOTICE OF DISMISSAL  
OF DEFENDANT SIGNATURE BANK**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiff O'Keefe hereby gives notice that all causes of action in the Complaint [Doc. No. 1] against Signature Bank are voluntarily dismissed, without prejudice.

Signature Bank has filed neither an answer nor a motion for summary judgment as to these claims. Dismissal under Rule 41 is therefore appropriate. *See, e.g., Cordis Corp. v. Siemens-Pacesetter, Inc.*, 682 F. Supp. 1200, 1201 (S.D. Fla. 1987).

Dated: April 5, 2023

Respectfully submitted,

**STUMPHAUZER KOLAYA  
NADLER & SLOMAN, PLLC**  
2 South Biscayne Boulevard, Suite 1600  
Miami, Florida 33131  
T: (305) 614-1400  
F: (305) 614-1425

/s/ Jorge A. Pérez Santiago  
Timothy A. Kolaya, Fla. Bar No. 056140  
Jorge A. Pérez Santiago, Fla. Bar No. 91915  
Amy M. Bowers, Fla. Bar No. 105755  
[tkolaya@sknlaw.com](mailto:tkolaya@sknlaw.com)  
[jperezsantiago@sknlaw.com](mailto:jperezsantiago@sknlaw.com)  
[abowers@sknlaw.com](mailto:abowers@sknlaw.com)

*Co-Counsel for Plaintiff Connor  
O'Keefe and the Putative Class*  
**FISHMAN HAYGOOD, LLP**  
201 St. Charles Avenue, Suite 4600  
New Orleans, LA 70170  
Telephone: 504.556.5549  
Facsimile: 504.949.8202

/s/ Kerry J. Miller  
James R. Swanson, La. Bar. No. 18455  
(*Motion to Appear Pro Hac Vice* pending)  
Kerry J. Miller, La. Bar. No. 24562  
(*Motion to Appear Pro Hac Vice* pending)  
Benjamin D. Reichard, La. Bar No. 31933  
(*Motion to Appear Pro Hac Vice* pending)  
Molly L. Wells, La. Bar No. 36721  
(*Motion to Appear Pro Hac Vice* pending)  
Rebekka C. Veith, La. Bar No. 36062)  
(*Motion to Appear Pro Hac Vice* pending)  
C. Hogan Paschal, La. Bar No. 38495  
(*Motion to Appear Pro Hac Vice* pending)  
Monica Bergeron, La. Bar No. 39124  
(*Motion to Appear Pro Hac Vice* pending)  
[jswanson@fishmanhaygood.com](mailto:jswanson@fishmanhaygood.com)  
[kmiller@fishmanhaygood.com](mailto:kmiller@fishmanhaygood.com)  
[breichard@fishmanhaygood.com](mailto:breichard@fishmanhaygood.com)  
[mwells@fishmanhaygood.com](mailto:mwells@fishmanhaygood.com)  
[rveith@fishmanhaygood.com](mailto:rveith@fishmanhaygood.com)  
[hpaschal@fishmanhaygood.com](mailto:hpaschal@fishmanhaygood.com)

[mbergeron@fishmanhaygood.com](mailto:mbergeron@fishmanhaygood.com)

*Co-Counsel for Plaintiff Connor  
O'Keefe and the Putative Class*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 5, 2023, I electronically filed the foregoing document with the clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Jorge A. Pérez Santiago  
JORGE A. PÉREZ SANTIAGO